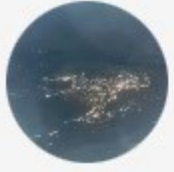


**Exhibit A to
Declaration of Ian A.
Herbert**



Fronx



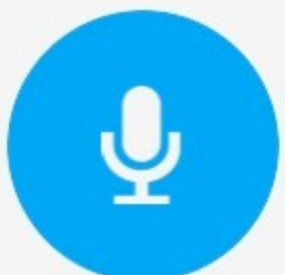
Hi, please wait. Let me arrange details.

How long? I have a meeting soon



5-10 min

1. NDR came in our contact in mid-2015. In early 2016 NDR contacted us for a special project related to FA whereby he shared two detailed documents on FA.
2. In early 2016, one of FA's close associate(not identified by anyone till now) was compromised subsequently Rey Adams, Afsaneh Azadeh etc. data was successfully breached. After this FA's accounts were also breached(fa system password- alglondon22 & fa wifi username- Farhad Azima and wifi password- 0123456789)
3. All the data was shared



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Fronx



with NDR through we transfer links via an encrypted communication app.

Further updates of data for Rey and FA were shared with NDR.

4. On instructions of NDR in June 2016; three laptops were arranged and all the breached data was copied into them. These laptops were delivered in London to Neil Gerrard via special route.

5. Around July 2016, based on detailed discussion between NDR, Neil and others it was considered to use the data of FA in court and for this purpose data had to be put on Internet securely without traces.

6. FA data was divided into 3 tranches and was put on torrents and we-transfer in multiple phases as instructed by Neil via NDR.

7. In 2017, two mobile phones and one ipad were



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**Fronx**

instructed by Neil via NDR.

7. In 2017, two mobile phones and one ipad were specifically crafted and delivered to NDR in Dubai on his instructions.

8. In late 2017, number of meeting were held in RAK. Multiple meetings were held in London and Dubai in 2017, 2018 and so on.

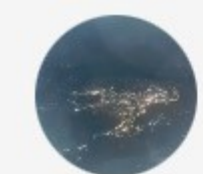
This is just a small writeup, everything in detail and what transpired from 2018 till now can be discussed later on physically.

Also, Pandey can assist in reversing his 2 witness statement and assist further if needed.

18 May 4:07 AM

Hi, I hope our intent is clear to you now.

Let me know if we can proceed further on this?



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Secure connection in progress...



8. In late 2017, number of meeting were held in RAK. Multiple meetings were held in London and Dubai in 2017, 2018 and so on.

This is just a small writeup, everything in detail and what transpired from 2018 till now can be discussed later on physically.

Also, Pandey can assist in reversing his 2 witness statement and assist further if needed.

18 May 4:07 AM

Hi, I hope our intent is clear to you now.
Let me know if we can proceed further on this?

19 May 10:36 AM

Hi, Is there any further update?



Type a message

